

REMARKS

In the Office Action,¹ the Examiner rejected claims 1, 2, 4, 5-7, 9, 11-15, 17-19, 21, and 22 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Application Publication No. 2002/0015042 to *Robotham*.

By this response, Applicants have amended claims 1, 2, 4, 5, 7, 9, 11-15, 17-19, 21, and 22, and canceled claim 6 without prejudice or disclaimer. Claims 1, 2, 4, 5, 7, 9, 11-15, 17-19, 21, and 22 are pending.

Applicants respectfully traverse the rejection of claims 1, 2, 4, 5-7, 9, 11-15, 17-19, 21, and 22 under 35 U.S.C. § 102(b) as being anticipated by *Robotham*. Claim 6 has been canceled, rendering the rejection moot with respect to this claim.

Claim 1 recites a combination of elements including, for example, instructions to “pre-process the selected future user interaction events to generate ... future user interface appearances corresponding to the generated future user interface states while the user interface is in the current user interface state” (emphasis added). *Robotham* does not teach or even suggest at least this feature of claim 1.

Robotham discloses displaying visual content on a client device by rendering the content on a server, transforming the visual content into bitmaps compatible with the client device, and transmitting the bitmaps to the client device (*Robotham*, abstract). *Robotham* also discloses “selection events” corresponding to active choices by users at the client, and “echoing” the selection events to the server (*Robotham*, ¶ 291). The

¹ The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

server may “pre-fetch” content related to an area of visual content related to the selection event (*Robotham*, ¶ 297).

The Office Action appears to take the position that *Robotham*’s “pre-fetch[ed]” content corresponds to the claimed “user interface appearances” (Office Action at page 5). However, even assuming this is correct (a position Applicants do not concede), *Robotham*’s content is not generated while the user is performing the “selection events.” Rather, *Robotham*’s disclosure that the content is “pre-fetch[ed]” indicates that the content has already been generated before the selection event is received. Thus, *Robotham*’s “pre-fetch[ed]” content is not generated while in a “current interface state,” but, having been generated before the selection event occurs, is merely retrieved when the selection event occurs.

Robotham also discloses client-side caching of content representations, and uses a “cache validation scheme” to determine which caches are valid (*Robotham*, ¶ 300). *Robotham* also employs an “aging threshold” to determine when content in the cache should be refreshed from the server (*Robotham*, ¶ 300). The Office Action relies on *Robotham*’s cached content in addressing the claimed “user interface appearances” (Office Action at page 5). However, like *Robotham*’s “pre-fetch[ed]” content, *Robotham*’s cached content is not generated while the user enters the selection events. Rather, because *Robotham*’s content is “cached,” the content has necessarily already been generated before the selection event occurs. For the reasons set forth above, *Robotham* does not teach or suggest instructions to “pre-process the selected future user interaction events to generate … future user interface appearances corresponding

to the generated future user interface states while the user interface is in the current user interface state" (emphasis added), as recited by independent claim 1.

Claim 1 further recites "estimat[ing] a likelihood for the future user interaction events to occur based on a history of previous user inputs to the user interface."

(emphasis added). As discussed, *Robotham* stores content representations in a cache, and employs an "aging threshold" to determine which content representations should be stored in the cache (*Robotham*, ¶ 300). However, *Robotham* does not disclose estimating a likelihood that future interaction events will occur. Rather, *Robotham* merely discloses replacing cached content representations that have been stored in the cache for an amount of time that exceeds the aging threshold (*Robotham*, ¶ 300). Therefore, *Robotham* also fails to teach or suggest "estimat[ing] a likelihood for the future user interaction events to occur based on a history of previous user inputs to the user interface," as recited by independent claim 1 (emphasis added).

Because *Robotham* does not disclose each and every element recited by claim 1, *Robotham* cannot anticipate this claim, and claim 1 is allowable over the art of record. Claims 2, 4, 5, 7, 9, 11-13 and 22 are also allowable at least due to their dependence from claim 1.

Independent claims 14 and 18, though of different scope from claim 1, recite elements similar to those set forth above for claim 1. Claims 14 and 18 are therefore allowable for at least the reasons presented above with respect to claim 1. Claims 15, 17, 19, and 21 are also allowable at least due to their dependence from claims 14 and 18. Claim 6 has been canceled, rendering the rejection moot with respect to claim 6.

For at least the above reasons, Applicants respectfully request that the Examiner withdraw the rejection of claims 1, 2, 4, 5, 7, 9, 11-15, 17-19, 21, and 22 under 35 U.S.C. § 102(b).

Dependent claim 12 is further distinguishable from *Robotham*. Claim 12 recites “each of the selected future user interaction events has estimated likelihoods of occurrence exceeding a threshold probability, and the future user interaction events other than the selected future user interaction events have estimated likelihoods that do not exceed the threshold probability” (emphasis added). As discussed, *Robotham* discloses a “cache validation scheme” where the client requests refreshed data from the server whenever the age of the data at the client exceeds a certain threshold (*Robotham*, ¶ 300). However, *Robotham*’s threshold simply constitutes an amount of time that expires before the client requests refreshed data from the server (*Robotham*, ¶ 300). *Robotham*’s threshold is thus not a threshold probability, but at best a threshold time. Therefore, *Robotham* does not teach or even suggest “each of the selected future user interaction events has estimated likelihoods of occurrence exceeding a threshold probability, and the future user interaction events other than the selected future user interaction events have estimated likelihoods that do not exceed the threshold probability,” as recited by dependent claim 12 (emphasis added)

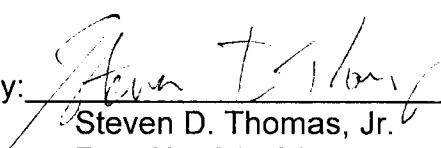
In view of the foregoing, Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge
any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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By: 
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Reg. No. 64,421